



Substance Abuse and Mental Health
Services Administration

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August 4, 2021

Jessica Rosenworcel
Acting Chairwoman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket No. 18–336; FCC 21–47; FR ID 24892. Implementation of the National Suicide Hotline Improvement Act of 2018.

Dear Ms. Rosenworcel:

The U.S. Department of Health and Human Services' (HHS) Substance Abuse and Mental Health Services Administration (SAMHSA) submits the following comments as part of the docket in the matter of the implementation of the National Suicide Hotline Improvement Act of 2018.

SAMHSA is the agency within HHS that administers the National Suicide Prevention Lifeline (Lifeline). On June 16, 2021, SAMHSA awarded Vibrant Emotional Health (Vibrant) the grant to function as the administrator of the Lifeline from September 2021 through September 2026, with responsibility for incorporating the new 988 dialing code into the Lifeline's network of over 180 crisis centers. Vibrant, in partnership with SAMHSA, has administrated the Lifeline since its founding in 2005.

SAMHSA is very appreciative of our partnership with the Federal Communications Commission (FCC) in implementation of both the National Suicide Hotline Improvement Act, and the National Suicide Hotline Designation Act, as we work together toward full, national availability of 988 as the new national suicide prevention and mental health crisis hotline number by July 16, 2022.

SAMHSA is supportive of requiring covered text providers to support text messaging to 988 and agrees that texting capability would improve the equitable access to the Lifeline, especially for young people and other individuals from vulnerable communities.

SAMHSA believes that if texting to 988 is unavailable, there is likely to be confusion among Americans regarding the capabilities of 988, and that as a result, individuals in crisis may text 988 in vain. It is worth noting that prior to the Lifeline's initiation of texting capabilities, it was discovered hundreds of individuals had texted the 1-800-273-8255 number for help.

Realization of the latter was one of several reasons the Lifeline incorporated texting capabilities into select Lifeline centers beginning on August 10, 2020. The Lifeline has since handled 33,518 texts from August 10, 2020 through May 31, 2021 without any promotion of the availability of a texting service. Currently, 33 Lifeline centers provide text services. However, demand for Lifeline text services exceeds capacity. In 2020, approximately 44 percent of texts went unanswered due to insufficient Lifeline capacity. While Lifeline capacity to respond to text has improved, lowering the rate of unanswered texts to 31 percent in May 2021, expanding text capacity would clearly be needed in the event the FCC requires texting to 988. To meet this demand, SAMHSA would explore both existing sources of text capacity outside the current Lifeline network, as well as expanding text capacity within the Lifeline network. However, capacity to administer and handle texts must also be expanded upon in order to address growing demand. SAMHSA, in its Funding Opportunity Announcement, required the Lifeline to assure capacity for calls, chat, and text. SAMHSA also provided \$32 million in supplemental dollars to the Lifeline, and the President's Budget has requested \$102 million with a goal of assuring adequate capacity for phones, chats, and texts associated with full implementation of 988.

As referenced in the proposed rule, youth overwhelmingly rely on texts over calls as a preferred method for communication and would be particularly likely to use the 988 texting service. In SAMHSA's experience, individuals who text or chat to the Lifeline both 1) skew younger and 2) are more likely to be experiencing current suicidal ideation relative to those who access the Lifeline via phone. SAMHSA also agrees with the assessment that other vulnerable groups may be more likely to use the texting service, as opposed to calling the Lifeline. For example, people with autism spectrum disorder (ASD) are at an increased risk for suicide, yet some individuals with ASD have difficulties with back and forth conversations,¹ and may therefore prefer to text rather than call the Lifeline. Further, many people in crisis, across all ages and demographics, may feel more comfortable expressing their thoughts and emotions via text, perhaps even more so in 2021 when texting has become such a ubiquitous method of communication.

Per the FCC's question regarding how people with disabilities access the Lifeline, individuals who are deaf or hard of hearing have the option to chat with a Lifeline counselor 24/7 via the online chat system and TTY Users can use their preferred relay service or dial 711, then 1-800-273-8255. However, texting services may provide a more accessible option, particularly for those without access to computers or broadband services.

In summary, while making texting to 988 operational would pose challenges for SAMHSA in assuring adequate response capacity, the alternative of not facilitating texting to 988 would mean reduced access for youth and other at risk populations, and would likely lead to significant

¹ National Institute of Mental Health (2018). Autism Spectrum Disorder. Retrieved: <https://www.nimh.nih.gov/health/topics/autism-spectrum-disorders-asd/>.

numbers of Americans in crisis attempting to access 988 by text only to discover the service does not exist. Hence, stable and effective implementation of 988 requires a texting option be available. SAMHSA looks forward to continued collaboration with the FCC on this important matter.

Sincerely,

A handwritten signature in black ink that reads "Miriam Delphin-Rittmon". The signature is fluid and cursive, with the first name "Miriam" being the most prominent part.

Miriam Delphin-Rittmon, Ph.D.

Assistant Secretary for Mental Health
and Substance Use